IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF ARKANSAS JONESBORO DIVISION

JAMES E. OLIPHANT

PLAINTIFF

v. CASE NO. 3:18-cv-00033-DPM

FCA US LLC (Formerly CHRYSLER GROUP LLC)

DEFENDANT

<u>DEFENDANT FCA US LLC'S</u> MOTION TO EXTEND DISCOVERY DEADLINE

Defendant FCA US LLC ("FCA") hereby requests that the Court extend the current discovery deadline pending a ruling on FCA's motion for summary judgment (Dkt. No. 29). The current discovery deadline is April 15, 2019, pursuant to the Court's Final Scheduling Order (Dkt. No. 8). FCA has attempted to contact plaintiff's counsel multiple times, to no avail, regarding depositions that need to be taken before the deadline. In hopes that it can avoid unilaterally noticing plaintiff, James E. Oliphant, and other fact witness depositions at a time that might not be convenient for them, FCA requests that the Court extend the discovery deadline until the pending motion for summary judgment has been ruled upon. This extension is requested in good faith will not prejudice the plaintiff.

WHEREFORE, FCA prays that the Court grant its motion, extend the current discovery deadline pending a ruling on its motion for summary judgment, and for all other proper relief.

Respectfully submitted,

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By /s/Jessica Pruitt Koehler

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